

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

EUCLIDES SOTO, et al.,

Plaintiffs,

**V.**

UNITED STEELWORKERS OF AMERICA,  
LOCAL 421-U, and UNITED STEELWORKERS  
OF AMERICA,

Defendants.

Civil Action No.  
04-10892-JLT

## DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS

1. The dispute in this case concerns the relationship between employees and their union. Because this case involves a suit against a union, have you yourself ever had a negative experience with a union?
2. Have you ever been involved in a matter involving a union?
3. The union involved in this case is the United Steelworkers. Is there anything about the fact that this case involves the United Steelworkers union that might cause you to have any concern?
4. Have you, or a relative, or a close friend ever worked for a factory or other employer that went out of business?
5. Have you ever experienced discrimination based on factors such as race, color, national origin, age, sex, or disability?
6. Have you ever had any involvement in a discrimination lawsuit of any kind?
7. Have you ever had a claim against an employer?

Respectfully submitted,  
UNITED STEELWORKERS, LOCAL 421-U  
AND UNITED STEELWORKERS,  
By their attorneys,

Dated: January 19, 2007

s/Alfred Gordon  
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### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served by electronic notice on the attorney of record for each party on January 19, 2007.

s/Alfred Gordon  
Alfred Gordon